

## United States Country Comments

### Guidelines for Regulating Wood Packing Material Used in the Transport of Commodities

10/29/01

General: The United States would like to see a number of major changes made to this standard before it can be accepted. We need to be sure that we have scientific data backing up our assumptions that the proposed treatments kill quarantine pests. We should, therefore, list the class of pests that are controlled by each treatment. Also, we are not sure there is much difference between the long-term and short-term treatments as far as causing a long-term affect.

Specific Changes:

#### SCOPE

**Comment** – Change “Scope” to read, “This standard describes phytosanitary measures relevant to the use of wood packing materials in international trade.

We don’t need to describe phytosanitary measure with the scope because it already has a definition. Wood packing material also is described.

#### DEFINITIONS AND ABBREVIATIONS

**Comment** – We think it might be useful for the Glossary group to reexamine the definition of “Wood”. There is no mention of logs, it just refers back to wood. We could refer to one of the dictionary definitions, for example, “The hard, fibrous substance composing most of the stem and branches of a tree or shrub, and lying beneath the bark”, or “The secondary xylem of trees and shrubs, lying beneath the bark and consisting largely of cellulose and lignin.” Changing the definition would effect the other terms, however, so this would have to be considered.

**Comment** – Change “chemical pressure impregnation” to read, “A process of treating wood with a chemical preservative or pesticidal agent which employs pressure to ensure that the chemical penetrates the wood to the intended degree.” We believe this is different than a chemical preservative.

**Comment** – Consider the following definitions and changes:

*Dunnage* – We understand that the current definition tries to differentiate between packing material that goes with the consignment and that which does not.

Note that many times dunnage remains with the consignment because it is a component of the blocking and bracing and may be secured to the primary package and the removal is not necessary for the removal of the consignment from the intermodal container. Also, these products may stay with the consignment until final destination. Would this type of material then be dunnage or packing material? The industry considers this dunnage, Under our definition it is packing material. Is it necessary to make a distinction? The definition of “wood packing material” would seem to cover dunnage.

Add the following definition; “*Processed wood material* – Products that are a composite of wood constructed using glue, resin, heat pressure of any combination thereof such as: plywood and oriented strand board.” We believe it would be useful to have this in the definition section. This then explains the term processing when used in the definition of “raw wood”.

**Comment** - Add PRA – Pest risk analysis

PRA is used in the standard but is not defined.

**Comment** – “Treatment” should read, “Officially authorized procedure for killing, removal or rendering pests infertile.”

You can’t render something infertile of pests.

## OUTLINE OF REQUIREMENTS

**Comment** – In the first paragraph delete the word “unprocessed” since it doesn’t fit with any of the definitions. Change the second “is frequently” in the first sentence to “may be”. Delete the rest of the paragraph and add, “The application of effective treatments and adequate markings to indicate this treatment should be acceptable for allowing the entry of wood packing material.” See comment below on long- and short-term treatments.

In the second paragraph, delete the phrase “technically justified”. Countries may choose to have less stringent requirements. Also, we may need to delete the reference to long- and short-term measures unless adequately explained in the appendix..

In the third paragraph, we may need to delete the reference to “long” and “short” term treatments.

**Comment** - Add the heading, GENERAL REQUIREMENTS before “Purpose”.

**Comment** – In 1. Purpose, change the first sentence to read “Wood packing materials .....” We don’t need to explain the term since it is defined.

**Comment** – Replace second sentence with, “Such packing products, which are not normally processed or treated to eliminate pests, create a risk of pest introduction and spread.” This eliminates the term “non-manufactured “ which is not defined. And in the third sentence add “material” after “wood packing”.

**Comment** – Second paragraph, first sentence, change to read, “NPPOs may establish requirements for wood packing materials to manage the pest risk associated with these products.”

**Comment** – The thought that the standard provides means to manage major risks versus all risk associated with wood packing material is valid. The last paragraph states this, but this is not backed up by information in Appendix I and III. Be believe this information should be included in the Appendixes. In the last sentence change “For this reason” to “Consequently” and change “a number of others” to “less serious pests”. These changes make the sentence grammatically correct.

**Comment** – In 2.1, second paragraph, delete the reference to wood cut into thin pieces. This does not render wood free of pests, for instance Pine Wood Nematode. Also, it is questionable that veneer peeler cores are free of pests. There is also the practical problem of certification. How would a pallet manufactured from “exempt” peeler logs be identified? The HT stamp would only be applicable in situations where it is proven that the core temperature exceeded the temperature and time requirements to qualify for the stamp. Due to the issues discussed, veneer peeler logs should be regulated like all other logs.

**Comment** - In 3. and 4., We’re not sure if there really is a different between long and short term treatments. Once the wood is rendered free of quarantine pests it is probably not likely to be re-infested with those pests.

In 4., if the term “short term” is to be used and a measure such as fumigation using MB is used (4.1) then there needs to be information on the time of treatment to shipping. We suggest 30 days from treatment to shipping. There is also the question of safeguarding. Should the material be safeguarding after treatment? If it is a short term treatment and there is belief the wood can be re-infested, then we think it would be necessary.

Also, is there creditable evidence that re-used wood packing material is a pathway for the introduction and spread of pests? If the wood has been in service for a year or more and especially if it has been treated, the risk of harboring insect pest is small.

**Comment** – In 4., third paragraph, the first sentence mentions the need for an official certificate, but in the second sentence it mentions that it may be a commercial certificate. This is inconsistent. In the last line of 4.1, change “imported country” to “importing country”.

**Comment** - In 7. Dunnage, dunnage is a high-risk product and should be treated like all other wood packing material.

**Comment** – In 9.2.1., To simplify the sentence change to read, “Where importing country requirements were not met or the wood packing material is infested with regulated pests, treatment, disposal, or refused entry are enforcement options.”

**Comment** – In section 9.3., we should make it clear that “holes” by themselves do not indicate live pests. It would be useful to include more examples of “signs of live pests”.

**Comment** – In section 9.4, Incineration, burning is not an option for CCA treated wood because the fumes may be toxic. Under Burial, what is “N.B.”? This needs to be defined. Under “Other Methods”, change to read, “Other Disposal Methods”. The last paragraph seems out of place. Make it the second sentence of the first paragraph of this section.

## APPENDIX I

**Comment** – In Appendix I, “Long-Term Measures”, what makes heat treatment a long term treatment? Does heat treatment without kiln-drying really change the character of the wood or is it just killing pests? How is this different with treatment with methyl bromide? An explanation of why heat treatment is a long-term treatment needs to be given. It would seem that kiln-dried wood would have less of a chance of re-infestation because it is drier.

We also believe that information needs to be given on what pests are controlled and/or which are not. Are all, or even most, insect pests killed by 56/30? Is there any data that supports this? If this is a recognized treatment for a certain class of pests, then we need to list these classes of pests. All pests do not have to be listed individually, but general classes at the minimum should be listed. This is a critical point, since this kind of information is needed by countries to decide if this standard will give them adequate protection. The treatments listed are probably effective against certain insects, but not nematodes, and fungal pathogens.

In footnote 4, the reference to being a commercially feasible treatment should be deleted. For many countries the treatment is not feasible. Identifying the pests the treatment kills is the important factor.

## APPENDIX II

**Comment** – In Appendix II, an official name for the mark should be established. This will help when the mark is used world-wide. Under the section that reads “The mark should at minimum include the:” and then there are points preceded by dashes. Number those dashes and number the corresponding areas on the symbol that they apply to.

In the fifth paragraph, define the term “reconditioned wood packing material”. This is a new term that has been brought in that has not yet been defined.

## APPENDIX III

**Comment** – Again, we need to list what pests MB is effective against. Countries need to have this information to decide if this treatment will provide them adequate protection.

#### APPENDIX IV

**Comment** - Change the title to “Additional Measures”

The last term “Chemical dip” should be bolded since it is a stand-alone treatment and not under Controlled atmospheres.